

## SCOTIA PACIFIC COMPANY LLC

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June 2, 2008

Mr. Robert Klamt, Timber Harvest Division Chief  
California Regional Water Quality Control Board  
North Coast Region  
5550 Skylane Blvd, Suite A  
Santa Rosa, CA 95403

Subject: Enrollment of THP 1-05-123 HUM (Unit 3) in the Freshwater Creek WWDR, "Tier II"

Dear Mr. Klamt:

PALCO is requesting Tier II enrollment under Watershed-Wide Waste Discharge Requirement (WWDR) Order No. R1-2006-0041 for unit 3 of THP 1-07-136 HUM. This unit is comprised of 26.2 clear-cut equivalent acres. Total acres currently enrolled or proposed for enrollment under Order No. R1-2006-0041 Tier II is shown in the Attached Pre-Harvest Planning Report provided by Area Forester, Mr. Wayne Rice. An updated Erosion Control Plan (ECP) identifying items specific to this unit is attached. Form 200 and an annual waste discharge enrollment fee were previously submitted and found complete and compliant with the WWDR.

Landslide risks associated with this plan were evaluated in compliance with the Freshwater Creek and Elk River WWDR Permit Acreage Enrollment and Compliance Monitoring Program Quality Assurance Project Plan (Version 2.0, September 1, 2006) approved by the Executive Officer of the North Coast Regional Water Quality Control Board. This approach uses commonly accepted standards for geologic practices in forest management (Sidle et al. 1985, Soeters and Van Western 1996, and Sidle and Ochiai 2006) to assess factors known to contribute to landslides, such as steepness of slope, slope convergence, hydrology, geologic features, and visibly unstable areas. Overlapping and complementary scientific techniques combining state-of-the-art digital elevation model (DEM) slope stability models, field investigation, and terrain analysis were used in this assessment.

In summary, the landslide risk evaluation found the following. Unit 3 occupies north facing, low to moderate gradient slopes (5-50%) underlain by mélange of the Franciscan Central Belt. Remote CGS and watershed analysis mapping indicated the potential presence of a deep-seated earthflow underlying much of the unit. Further focused assessment of this feature, including by CGS during initial THP review and approval, has determined the earthflow, if present, is active-dormant in nature, exhibiting no evidence of historical or recent movement. No other active or potential unstable areas were identified during initial THP development and review or subsequently during 'Tier 2' landslide hazard assessment. The unit is drained by two Class II and several Class III watercourses.

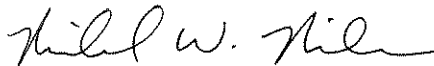
The THP proposes an even-age stand replacing silviculture outside of Riparian Management Zones (RMZ). Class II RMZs consist of 30-wide no harvest zones directly adjacent to streams with additional stream protection in the form of an outer-band selective harvest area of variable width

dependent upon streamside slope inclination and condition. The Class III watercourses will retain all channel trees and all trees less than 8 inches dbh within 15 of the watercourse. Sub-merchantable trees and those with specific wildlife value characteristics (e.g., cavities, large limbs, broken tops, snags, etc.) will be retained within the harvest area to the extent feasible. Cable yarding is approved for the western one-third of the unit, while ground-based yarded (e.g. tractor, rubber tired skidder/forward, and shovel) is planned for the remainder. Equipment exclusion zones minimize slope disturbance adjacent to watercourses. Helicopter is also an approved yarding method. Post-harvest site preparation includes the option for pile and/or 'jack pot' burning outside of riparian management and equipment exclusion zones; and mechanical piling and/or mastication in the designated ground-based yarding areas.

Greater detail regarding this landslide hazard assessment is provided in the attached *THP Unit Review for Tier 2 Enrollment*. Removal of one potential mass wasting area of concern resulted from this assessment. The licensed geologist involved with the Tier 2 landslide risk evaluation has concluded the proposed harvest operation, if implemented as planned and approved, will result in a negligible increase in potential for post-harvest landsliding; and thereby meets the applicable Zero Delivery of landslide related sediment performance standards of NCRWQCB Orders R1-2006-0041 and R1-2008-0071.

Please do not hesitate to contact me should you have any questions or comments regarding this application for enrollment into WWDR (Order No. R1-2006-0041).

Respectfully,



Michael W. Miles, RPF  
Director Resource Protection  
Scotia Pacific Company, LLC

Attachments:

Professional Certification of Design  
Pre-harvest Planning Report  
THP Unit Review for Tier II enrollment  
Updated Erosion Control Plan